

AO 91 (Rev. 11/11) Criminal Complaint

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

## UNITED STATES DISTRICT COURT

for the

District of Vermont

2022 MAR 24 PM 4:38

CLERK

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United States of America )

v. )

DANIEL RUIZ )

and )

JOEL IVAN CAQUIAS AVILES )

Case No.

2:22-MJ-34-1-2

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 23, 2022 in the county of Rutland in the  
District of Vermont, the defendant(s) violated:

## Code Section

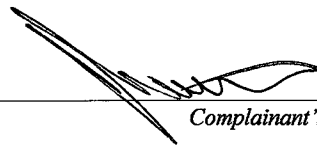
21 U.S.C. § 846

## Offense Description

Knowingly and intentionally conspired with each other and others to distribute heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

This criminal complaint is based on these facts:

See Attached Affidavit.

☒ Continued on the attached sheet.

Complainant's signature

SA Joseph Dornbrierer, HSI

Printed name and title

Sworn to before me and signed in my presence.

Date: 03/24/2022City and state: Burlington, Vermont

Judge's signature

Hon. Kevin J. Doyle, U.S. Magistrate Judge

Printed name and title